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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re)	Case No. 16-30406-rld11
)	
SeaPort Airlines, Inc.,)	
)	
Debtor-in-Possession.)	
SeaPort Airlines, Inc.,)	Adv. Pro. No. 16-03059-rld
)	
Plaintiff,)	MOTION FOR TEMPORARY RESTRAINING
)	ORDER
vs.)	
)	EXPEDITED HEARING REQUESTED
Robert McKinney)	
)	
Defendant.)	

Pursuant to 11 U.S.C. §105(a) and FRBP 7001(a) and 7065, Plaintiff SeaPort Airlines, Inc. ("SeaPort") moves this Court for a temporary restraining order:

1. Ordering McKinney to withdraw and to dismiss the post-petition whistleblower complaint filed with the Occupational Health and Safety Administration ("OSHA") without prejudice;
2. Restraining McKinney from continuing to prosecute the OSHA complaint; and

3. Restraining McKinney from prosecuting any other pre-petition claims against SeaPort.

The requested preliminary injunction will remain in effect through dismissal of the case, conversion of the case to a case under Chapter 7 of the Bankruptcy Code, or entry of discharge. This motion is supported by SeaPort's Complaint filed in this Adversary Proceeding, the Memorandum in Support of an Order for Temporary Restraining Order and Motion for Order to Show Cause, the Declaration of Nelson D. Atkin II, and the Court's records and file in this Adversary Proceeding and in the Main Case.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos

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Of Attorneys for Debtor-in-Possession

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11
SeaPort Airlines, Inc. v. Robert McKinney;
Adv. Pro. No. 16-03059-rld

CERTIFICATE - TRUE COPY

DATE: May 13, 2016

DOCUMENT: MOTION FOR TEMPORARY RESTRAINING ORDER
EXPEDITED HEARING REQUESTED

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
816 SW First Avenue
Portland, Oregon 97204

Rob McKinney
9502 NE 144th Ct
Vancouver, WA 98682

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 13, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
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